

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

JOSEPH PAPIN,

Plaintiff,

CASE NO: 3:17-CV-763-KHJ-FKB

vs.

UNIVERSITY OF MISSISSIPPI  
MEDICAL CENTER,

Defendant.

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**PLAINTIFF'S RENEWED MOTION FOR ENTRY OF FINAL JUDGMENT UNDER  
RULE 54(b), OR, IN THE ALTERNATIVE, MOTION FOR INTERLOCUTORY  
APPEAL AND STAY OF THIS ACTION**

Plaintiff, JOSEPH PAPIN, by and through his undersigned counsel, files this Renewed Motion for Entry of Final Judgment Under Rule 54(b), or, in the Alternative, Motion for Interlocutory Appeal and Stay of this Action. For the reasons set forth in the accompanying memorandum of law, this Court should enter final judgment under Federal Rule of Civil Procedure 54(b) as to its Order on the Parties' Motion for Summary Judgment (D.E. 170) or alternatively certify the Summary Judgment Order for interlocutory appeal. This Court should also certify its Order on Defendant's Motion *in Limine* regarding Plaintiff's "Lost Earnings Beyond One-Year Contract" (D.E. 192) for interlocutory appeal. After conferring with counsel for Defendants, Defendants oppose the Motion at this time.

Dated: October 4, 2021

**/s/ C. Ryan Morgan**

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 4, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to all counsel of record.

/s/ C. Ryan Morgan  
C. RYAN MORGAN, ESQ.  
(admitted pro hac vice)